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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

BARBARA HUBBARD,

Plaintiff,

vs.

THE VONS COMPANIES, INC., dba VONS  
#3063,

Defendant.

) Case No.: '08 CV 0229 DMS (POR)

) **JOINT MOTION TO EXTEND TIME TO**  
) **RESPOND TO COMPLAINT**

1 WHEREAS, plaintiff Barbara Hubbard ("Plaintiff") has filed a complaint in this action  
2 against The Vons Companies, Inc. ("Vons"), erroneously sued as "The Vons Companies, Inc.  
3 dba Vons #3063";

4 WHEREAS, Vons has been served with the complaint and is currently due to answer or  
5 otherwise respond to the complaint on or before February 29, 2008;

6 WHEREAS, this extension will give the parties additional time to investigate Plaintiff's  
7 allegations and discuss a possible settlement;

8 WHEREAS, this extension is not sought for any improper purpose;

9 Plaintiff and Vons, by and through their respective counsel, hereby agree and stipulate  
10 that the time for Vons to answer or otherwise respond to Plaintiff's complaint be extended to  
11 March 7, 2008, and hereby move the Court to enter an order so extending Vons' time to  
12 respond to the complaint.

13 It is further agreed that this stipulation may be executed in counterparts. A proposed  
14 order will be concurrently submitted to the Court.

15 Dated: February 29, 2008                      DISABLED ADVOCACY GROUP, APLC

16  
17 By: /S/ Lynn Hubbard III  
18                      LYNN HUBBARD, III  
19                      Attorneys for Plaintiff

20 Dated: February 29, 2008                      MAZZARELLA ■ CALDARELLI LLP

21  
22 By: /S/ Michael D. Fabiano  
23                      MICHAEL D. FABIANO  
24                      Attorneys for Defendant  
25                      THE VONS COMPANIES, INC.  
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